

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
CLEVELAND DIVISION

UNITED STATES OF AMERICA, ) CRIMINAL NO.: 1:21-cr-226  
                                )  
Plaintiff,                 )  
                                ) JUDGE PAMELA A. BARKER  
vs.                         )  
                                )  
                                )  
DAVIS LU,                 )  
                                )  
Defendant.                 )

**DEFENDANT'S MOTION FOR LEAVE  
TO FILE UNDER SEAL**

Now comes the Defendant, Davis Lu, by and through undersigned counsel, Friedman, Nemecek, Long & Grant, L.L.C., and hereby respectfully requests leave of this Honorable Court to file its Brief in Opposition to the Government's Motion to Exclude Defense Expert's Report and Inadmissible Testimony (ECF #50) under seal. The Brief contains sensitive and proprietary information concerning the Corporation as well as other third-parties. Public disclosure of this information could be harmful to the Corporation. After filing, the defense will serve counsel for the Government with the document via e-mail.

Respectfully submitted,

/s/ Eric C. Nemecek  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion for Leave to File Under Seal was filed by CM/ECF on the 19th day of July, 2024, which will send a notification of such filing electronically to the following: Brian Deckert, Assistant United States Attorney, 801 Superior Avenue, Cleveland, OH 44113.

Respectfully submitted,

/s/ Eric C. Nemecek  
ERIC C. NEMECEK  
IAN N. FRIEDMAN  
Counsel for Defendant